

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>DANIEL GRAND,</b>	)	<b>CASE NO: 1:22-cv-1594</b>
	)	
<b>Plaintiff,</b>	)	<b>JUDGE BRIDGET M. BRENNAN</b>
<b>v.</b>	)	
	)	
<b>CITY OF UNIVERSITY HEIGHTS, et al.</b>	)	<b><u>MOTION FOR ENLARGEMENT</u></b>
	)	<b><u>OF TIME WITHIN WHICH TO</u></b>
<b>Defendant.</b>	)	<b><u>MOVE OR PLEAD TO</u></b>
	)	<b><u>PLAINTIFF’S FIRST AMENDED</u></b>
	)	<b><u>COMPLAINT</u></b>
	)	

Defendant Jack Kluznik (“Defendant Kluznik”), by and through undersigned counsel and pursuant to Fed.R.Civ.P. 6(b), hereby respectfully moves this Court for an enlargement of time to July 28, 2023 to move, plead, or otherwise respond to the first amended complaint. The reason for this request is that Defendant Kluznik is a newly added defendant and undersigned counsel requires additional time to review the substantial written discovery exchanged amongst other parties in this matter. Defendant Kluznik does not seek this extension for purposes of delay and no party will be prejudiced by this request as other defendants have been granted the same leave to respond to the first amended complaint. (5/24/23 Order.) Counsel for Plaintiff Daniel Grand does not oppose the requested leave.

Defendant Kluznik has not previously been granted an enlargement of time to respond to the first amended complaint. For the reasons set forth above, Defendant Kluznik respectfully requests that this Court grant him an extension of time to July 28, 2023 to move, plead, or otherwise respond to the first amended complaint.

Respectfully submitted,

/s/ Joseph Monroe II

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**CERTIFICATE OF SERVICE**

I hereby certify that on **June 22, 2023**, the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Joseph Monroe II

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